

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

In re:)	Case #17-31351-dof
)	
April R. Braman)	Chapter 7
)	
Debtor.)	Judge: Daniel S. Opperman
)	
	/	

MOTION FOR AUTHORITY TO REDEEM PERSONAL PROPERTY AND
APPROVAL OF ASSOCIATED FINANCING AND ATTORNEY FEES
UNDER 11 U.S.C. 722

NOW COMES the Debtor, by and through counsel, MCGIVNEY LAW FIRM, PLLC, and moves the Court pursuant to 11 U.S.C. 722 and Bankruptcy Rule 6008 for a Redemption Order on the following grounds:

1. The item to be redeemed is tangible personal property primarily used for personal, family or household use and is more particularly described as follows: **2014 Ford Escape; VIN #1FMCU9J97EUB14396.**
2. The interest of the Debtor in such property will be abandoned by the estate because it is of no value to the Trustee and the debt which is secured by said property to the extent of the allowed secured claim of University of Michigan Credit Union is a dischargeable consumer debt.
3. The allowed secured claim of University of Michigan Credit Union for purposes of redemption, the "redemption value", should be determined to be not more than **\$15,046.00** as evidence by the attached valuation report.
4. Arrangements have been made by the Debtor to pay said creditor up to the aforementioned amount in a lump sum should this motion be granted.
5. The payment for this proposed redemption is to be financed through Prizm Financial Co., LLC, with all of the particulars of that financing (interest rate, finance charge, amount financed, total payments, amount of payments, etc.) set forth in full detail in the attachments hereto. As demonstrated there, the monthly amount, term of the payments and the overall amount of the repayment will be decreased significantly through the proposed redemption. Moreover, the Debtor has agreed to borrow and disperse additional funds in the amount of \$600.00, from the loan with Prizm Financial Co., LLC, for representation of the Debtor in securing for the benefit of the Debtor and order granting the Debtor the right to redeem

under 11 U.S.C. 722 a certain motor vehicle, such compensation being in addition to that previously disclosed and being for services rendered beyond the scope of the legal services to have been rendered for such compensation heretofore disclosed.

WHEREFORE, the Debtor requests the Court to enter a Redemption Order allowing the Debtor to redeem the above reference property for **\$15,046.00** to be paid within 21 days of entry of the Order, and whatever else the Court deems just and equitable. In the event the said Creditor objects to this motion, the Debtor requests the Court to determine the value of the property as of the time of the hearing on such objection.

/s/ Patrick V. McGivney

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